

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 04-11340 DPW

\*\*\*\*\*  
STEPHEN KEEFE, \*  
Plaintiff \*  
\*  
v. \*  
\*  
LOCAL 805, INTERNATIONAL \*  
LONGSHOREMEN'S ASSOCIATION, AFL-CIO, \*  
LOCAL 800, INTERNATIONAL \*  
LONGSHOREMEN'S ASSOCIATION, AFL-CIO, \*  
and LOCAL 799, INTERNATIONAL \*  
LONGSHOREMEN'S ASSOCIATION, AFL-CIO, \*  
Defendants \*  
\*\*\*\*\*

**PLAINTIFF'S PROPOSED VOIR DIRE**

Plaintiff Stephen Keefe requests that the following questions be asked of prospective jurors:

1. This case arises out of a dispute between a member of a Longshoremen's Union and three Locals of the Longshoremen's Union. Plaintiff Stephen Keefe basically contends that the defendants suspended him from working as a Longshoreman for six months because he had previously brought a law suit against the same the Locals. The defendants deny these allegations. Would this subject matter impede your ability to render a fair and impartial verdict in such a case?
2. Have you or any member of your family ever been a member in a Longshoremen's union?
3. Have you or any member of your family ever been an officer of a

Longshoremen's union?

4. Have you or any member of your family ever been a member in a union?
5. Have you or any member of your family ever been an officer of a union?

Stephen Keefe  
By his attorney



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Dated: November 13, 2007

Certificate of Service

I, Scott A. Lathrop, hereby certify that on this date I have electronically filed the foregoing Proposed Voir Dire with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all other Attorneys of Record.



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Scott A. Lathrop

Dated: November 13, 2007